

that "servo motor is adjusted to control the pressure applied on film material". However, expressions such as "easily" and "accurately" are relative terms. With reference to Figs. 7 and 8 of Fukuda, if the torque of the servo motor 45 is varied, it may be able to adjust the seal pressure, but this servo motor is adapted to drive the pull-down belts 30, as well as the vertical-seal belt 55. As a practical matter, therefore, there is no guarantee that the vertical seal heater should contact the pull-down belts at the same time as the film is contacted. It is like using a single cutting tool for chopping down a tree and sharpening a pencil. According to the present invention, (1) a high pressure is used to move the heater, (2) a low pressure is used for sealing, and (3) the low pressure is controlled in the sealing. It is like using an ax to chop down a tree and a pocket knife to sharpen a pencil and controlling the pocket knife in sharpening the pencil.

The Examiner also quotes Fukuda as saying that different combination of motion-communicating means and torque-communicating means can be substituted, but Fukuda is not thereby suggesting that the seal pressure can be controlled by a torque sufficient for causing the shaft to rotate through the Schmidt coupling. In other words, Fukuda is not hinting anywhere at controlling the seal pressure by low-pressure air, not by high-pressure aid for moving the heater. At the low pressure suitable for the sealing, the heater cannot be moved efficiently, as a tree cannot be chopped down efficiently by a pocket knife. At a pressure sufficiently high for moving the heater, on the other hand, it is too high for controlling the sealing, as an ax cannot be used conveniently for sharpening a pencil. It has therefore been known to use a spring or the like to control the seal pressure but the adjustment of the spring has to be done manually and it was an inefficient routine.

The Examiner further quotes Fukuda in Paragraph 3 of the Official Letter as talking about the film thickness in column 2 at lines 61-63, but the Examiner is requested to agree that there is no such statement in column 2 at lines 61-63.

Simionato was cited by the Examiner evidently for disclosing "selectively controlled stacked cylinders 9 and 10", that "the control unit effects switching of operation of cylinders 9 and 10", etc. but Simionato uses the cylinders 9 and 10 for effecting longer movements of the slides 7 (column 3 at lines 5-10) and nowhere discloses that different air pressures are applied for the motion between the operating position and the retracted position and for

pressing the film. It must thus be concluded that the Examiner was in error in stating that "the compressive force is considered and described by Simionato using higher and lower air pressures."

It is therefore to be concluded that the cited references, even if considered in combination, cannot predicate the Examiner's rejection.

In summary, it is believed that the application is allowable and such action at an early date is earnestly solicited.



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April 29, 2002
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